

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**GREENBERG TRAURIG, LLP**

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*Co-counsel to JPMorgan Chase Bank, N.A., as  
Administrative Agent*

In re:

Bed Bath & Beyond Inc., *et al.*,

Debtors.<sup>1</sup>

Case No.: 23-13359 (VFP)

Chapter: 11

Joint Administration Requested

**APPLICATION FOR THE *PRO HAC VICE***  
**ADMISSION OF ADAM L. SHPEEN, ESQ.**

JPMorgan Chase Bank, N.A. (“**Chase**”), by and through its undersigned co-counsel, Greenberg Traurig, LLP, respectfully makes this application (the “**Application**”), for *pro hac vice* admission of Adam L. Shpeen, Esq., and represents as follows:

1. On April 23, 2023, the above-captioned debtors and debtors-in-possession (the “**Debtors**”), filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, as amended the (“**Chapter 11 Cases**”) in the United States Bankruptcy Court for the District of New Jersey.

2. Mr. Shpeen is a partner of the firm of Davis Polk & Wardwell LLP, which

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<sup>1</sup> The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.’s principal place of business and the Debtors’ service address in these chapter 11 cases is 650 Liberty Avenue, Union, New Jersey 07083.

maintains offices at, among other places, 450 Lexington Avenue, New York, NY 10017. Because of his familiarity with the facts and circumstances relevant to the Debtors in the within matter, Chase requests that Mr. Shpeen be allowed to appear *pro hac vice* for the purposes of representing Chase, as administrative agent to the Debtors' prepetition revolving loan facility and secured creditor of the Debtors, in connection with the Chapter 11 Cases.

3. As set forth in the accompanying Declaration of Adam L. Shpeen, Esq., Mr. Shpeen is a member in good standing of the bars of the State of New York, the United States District Court for the Eastern District of New York, and the United States District Court for the Southern District of New York. Mr. Shpeen is not under suspension or disbarment by any court.

4. If admitted *pro hac vice*, Mr. Shpeen has represented that he will adhere to the disciplinary jurisdiction of this Court. Mr. Shpeen also has represented that he will arrange with the New Jersey Lawyer's Fund for Client Protection for payment of the applicable annual fee under New Jersey Court Rule 1:28-2(a) and shall pay the fee required by L. Civ. R. 101.1(c)(3) for *pro hac vice* admission to this Court.

WHEREFORE, it is respectfully requested that the Court grant this Application, pursuant

*[Remainder of page intentionally left blank.]*

to D.N.J. LBR 9010-1 and L. Civ. R. 101.1(c), to admit Adam L. Shpeen, Esq. *pro hac vice* in the above-captioned matter.

Dated: April 23, 2023

Respectfully submitted,

/s/ Alan J. Brody

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